

THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

JOHN KRAMER,

*Plaintiff,*

v.

MANGO LABS, LLC, DAFYDD  
DURAIRAJ, and TYLER SHIPE

*Defendants.*

CIVIL No.: 24-1587-GMM-MDM

JURY TRIAL DEMANDED

**MOTION INFORMING AVAILABILITY FOR MEDIATION HEARING**

TO THE HONORABLE COURT:

**COMES NOW** Plaintiff John Kramer, through the undersigned attorney, and very respectfully states and prays as follows:

1. On February 20, 2025, the Court held a conference in anticipation of a preliminary injunction hearing. During this hearing the topic of mediation was mentioned, and the presiding Magistrate Judge advised the parties to file a motion if they wished to explore this option.

2. Counsel for both parties have conferred and are available for an in-person mediation hearing on March 12, 2025, if the Court is available. The parties are also potentially available March 24-26, 2025, but Mr. Kramer's wife is scheduled to give birth on April 4, 2025, in Vermont. If delivery starts two weeks early Mr. Kramer would not be available.

3. To the extent the Court is able to hold an in-person mediation hearing, plaintiff would request that the briefing schedule set at the February 20, 2025, hearing in advance of the preliminary injunction hearing be moved to commence one week after mediation is concluded, if necessary.

WHEREFORE, for the reasons stated above, the parties respectfully request the Court set, if feasible, an in-person mediation hearing for March 12, 2025 ideally, or if necessary for March 24-26, 2025 but aware that if Mr. Kramer's wife commences labor early, he may not be available. Plaintiff further requests that to the extent the Court is able to hold an in-person mediation hearing, plaintiff would request that the briefing schedule set at the February 20, 2025, hearing in advance of the preliminary injunction hearing be moved to commence one week after mediation is concluded, if necessary.

I HEREBY CERTIFY that on this date I uploaded a pdf version of this document to the Court's CM/ECF system which will send notice of its filing electronically to all parties of record, through their attorneys of record.

In San Juan, Puerto Rico, this 25<sup>th</sup> day of February, 2025.

Respectfully submitted,

**S/ FRANCISCO E. COLÓN-RAMÍREZ**

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